

**REMARKS**

Applicants acknowledge receipt of the Examiner's Final Office Action dated January 10, 2007. This rejects all claims pending at that time. Specifically, all claims but Claims 42, 47, 52, and 57 were rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,477,543 issued to Huang (Huang) in view of U.S. Patent Publication No. 2001/0005849 filed by Boothby et al. (Boothby). Claims 42, 47, 52, and 57 were rejected under 35 U.S.C. §103 as being unpatentable over Huang and Boothby in view of U.S. Patent No. 6,564,263 issued to Bergman et al. (Bergman). In light of the foregoing amendments and following remarks, Applicants respectfully request the Examiner's reconsideration and reexamination of all pending claims.

Independent Claim 1 recites:

A method, comprising:

establishing a connection between a server and a synchronization client associated with a handheld device, the server having access to a first database and the handheld device having access to a second database, the handheld device comprising an application configured to allow user access to the second database, wherein the synchronization client is configured to use the connection in an operation to synchronize the second database and the first database;

receiving, from the server, first information indicative of a structure of the first database;

receiving, from the server, second information indicative of a version of the application;

sending, to the server, information of transactions performed on the second database;

comparing the second information with information stored on the handheld device that is indicative of a version of the application on the handheld device;

updating the application on the handheld device using metadata received from the server if the second information does not compare equally with the information that is indicative of the version of the application on the handheld device;

receiving, from the server, data to update the second data base.

As set forth above, independent Claim 1 now recites comparing the second information, which is indicative of version of the application, with information stored on the handheld device that is indicative of a version of the application on the handheld device. Applicants assert this limitation is not taught or fairly suggested within column 13, lines 50-60 and column 14, lines 20-30 of Huang. Column 13, lines 50-60 at best, describes comparing IDs to determine an update direction for each data item of an application in the handheld. It is noted that this section is concerned with updating data of the application, not the application itself. More importantly, Column 13, lines 50-60 doesn't appear concerned with comparing versions of applications. Column 14, lines 20-30, like Column 13, lines 50-60, is also concerned with updating data items during a synchronization operation. This section of Huang states that logic for an application can be written to take advantage of any version and update history information available from the handhelds in order to expedite the synchronization process. Again, this section of Huang seems to be concerned with updating data items of an application, rather than the application version itself. Nothing within Column 14, lines 20-30 appears to teach or fairly suggest comparing versions of applications as required by Claim 1. Given that Claim 1's limitation of "comparing the second information with information stored on the handheld device that is indicative of a version of the application on the handheld device" is not taught or fairly suggested in column 13, lines 50-60 and column 14 lines 20-30 of

Huang, it follows that independent Claim 1, as amended, is patentably distinguishable over the cited sections of Huang and Boothby.

Independent Claim 1 has also been amended to recite “updating the application on the handheld device using metadata received from the server if the second information does not compare equally with the information that is indicative of the version of the application on the handheld device.” Applicants have reviewed the cited sections of Huang and Boothby and can find no teaching or fair suggestion of the foregoing limitation. As such, Applicants assert that independent Claim 1, as amended, is patentably distinguishable over the cited sections of Huang and Boothby.

Independent Claim 11 has been amended to recited limitations that are similar to those of independent Claim 1 described above. Specifically, independent Claim 11 has been amended to recite:

means for comparing the second information with information stored on the handheld device that is indicative of a version of the application and the handheld device;

means for updating the application on the handheld device using metadata received from the server if the second information does not compare equally with the information that is indicative of the version of the application on the handheld device

For the reasons set forth above, Applicants assert that the foregoing limitations of independent Claim 11 are not taught in the cited sections of Huang and Boothby. As such, Applicants assert that independent Claim 11 is patentably distinguishable over the cited sections of Huang and Boothby.

Independent Claim 21 has been amended to recite limitations which are similar to the limitations of independent Claim 1 argued above. Applicants assert that independent

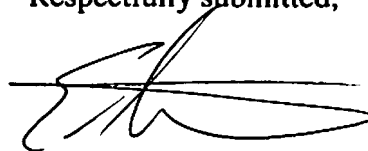
Claim 21 is patentably distinguishable over the cited sections of Huang and Boothby for the same reasons or similar reasons that independent Claim 1 is patentably distinguishable over the cited sections of Huang and Boothby. Additionally, independent Claim 21 recites “determining whether the handheld device has sufficient unused memory to store the filtered data.” Applicants assert this limitation of independent Claim 21 is not taught or fairly suggested in column 6, lines 29-55, column 10, lines 29-51, and column 13, lines 44-45 of Huang. Column 6, lines 29-55 of Huang teaches a synch proxy which can continuously monitor its computation load (e.g., in terms of the number of synch requests it is concurrently processing) against its computation capacity, which is fixed based on its CPU power, the size of its RAM and storage memory, and its network bandwidth capacity. It is important to note that the synch proxy of this cited section monitors its computation load based upon its computation capacity based on the size of its RAM, not based upon the size of the unused portion of its RAM to store data. Column 10, lines 29-51 is also concerned with the computation capacity of the sync proxy to receive requests, which as noted above is based upon the size of the RAM, not the size of the unused portion of the RAM. Column 13, lines 44-45 of Huang teaches the data formats may be different and that storage capacities between handheld device and the replica host may be different. This foregoing sections of Huang does not teach or fairly suggest the computation of determining whether the handheld device has sufficient unused memory to store the filtered data. As such, Applicants assert that independent Claim 21 , as amended, is patentably distinguishable over the cited sections of Huang and Boothby.

Independent Claim 31 has also been amended to recite “a device configured to determine whether a handheld device has sufficient unused memory to store the data provided by the server.” This limitation of independent Claim 31 is similar to the limitation of independent Claim 21 described above. Applicants assert that column 6, lines 29-55, column 10, lines 29-51, and column 13, lines 44-45 of Huang do not teach or fairly suggest this limitation of independent Claim 31. As such, Applicants assert that independent Claim 31 is patentably distinguishable over the cited sections of Huang and Boothby for the same or similar reasons that independent Claim 21 is patentably distinguishable.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5093.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Eric A. Stephenson', written over a horizontal line.

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